

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

**UNITED STATES OF AMERICA**

**PLAINTIFF**

**VS.**

**CIVIL ACTION NO. 3:16-CV-489-CWR-BWR**

**HINDS COUNTY, ET AL.**

**DEFENDANTS**

**UNOPPOSED MOTION FOR EXTENSION OF TIME**

Defendants Hinds County, Mississippi and Sheriff Tyree Jones, in his official capacity only (“Defendants”) respectfully move the Court for a two-day extension of time in which to file their response to the Court’s March 12, 2025, Text Only Order directing the parties to file recommended changes, if any, to the scope of the Receiver’s duties, and to highlight the record evidence relevant to the de novo review and analysis under the Prison Litigation Reform Act as required by the appellate mandate. In support of this Motion, Defendants state the following:

1. On March 12, 2025, the Court entered a Text Only Order allowing the parties 21 days to file recommended changes, if any, to the scope of the Receiver’s duties, and to highlight the record evidence relevant to the de novo review and PLRA analysis required by the appellate mandate. *See* 03/12/2025 Text Only Order. Thus, the parties’ responses to the order are due by April 2, 2025.<sup>1</sup>

2. During the week of March 24 to March 28, undersigned counsel had to travel out of town for personal reasons related to the medical condition of an immediate family member and was unable to continue devoting time to preparing Defendants’ response to the Court’s order. Since returning to Mississippi on the night of Thursday, March 27, 2025, undersigned counsel has

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<sup>1</sup> The Court’s March 12, 2025, text only order granted in part and denied in part the Government’s request for an additional thirty (30) days to file recommended changes, if any, to the scope of the Receiver’s duties, and to highlight the record evidence relevant to the de novo review and PLRA analysis required by the appellate mandate. *Compare* 03/12/2025 Text Only Order *with* Status Report [268] at 2.

also had to attend (remotely) follow-up appointments, with the latest taking place earlier today. Undersigned counsel has continued working to meet the Court's deadline but has not been able to make sufficient progress to meet the April 2, 2025 deadline given deadlines in other cases that have also been rescheduled under the circumstances.

3. Due to these circumstances, Defendants respectfully request a two-day extension, up to and through April 4, 2025, to file their response to the Court's March 12, 2025, order. Defendants respectfully submit that this modest extension is requested for good cause, as explained in the preceding paragraph, and not for delay.

4. Consistent with the Court's local rules, undersigned contacted the Government's counsel on March 31, 2025, and left a message. After speaking with a member of the Government's counsel team earlier today, undersigned counsel can confirm that the Government's counsel does not oppose Defendants' request for a two-day extension, provided the extension is granted for all parties, including the Government, so that the parties would all respond on the same day.

5. Given the nature of this request Defendants respectfully ask that the requirement of a separate memorandum in support be waived.

For these reasons, Defendants respectfully request a three-day extension, up to and through April 4, 2025, to file their response to the Court's March 12, 2025, order.

Dated: April 1, 2025.

Respectfully submitted,

PHELPS DUNBAR LLP

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***ATTORNEYS FOR DEFENDANTS***

**CERTIFICATE OF SERVICE**

I certify that I have this day had this motion electronically filed with the Clerk of the Court, using the CM/ECF system, which sent notification to all counsel of record.

This the 1st day of April, 2025.

/s/ Nicholas F. Morisani  
Nicholas F. Morisani